



VIRGINIA  
& AMBINDER LLP  
A t t o r n e y s   a t   L a w

40 Broad Street, 7<sup>th</sup> Floor  
New York, New York 10004  
Telephone: 212.943.9080  
www.vandallp.com

**Paige Piazza, Esq.**  
**Associate**  
ppiazza@vandallp.com

January 6, 2026

**VIA ECF**

Judge Joseph A. Marutollo, U.S.M.J.  
United States District Court,  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Laduca et al v. Bari Home Care, LLC et al*, Docket No. 24-cv-07970 (LDH)(JAM)

Dear Judge Marutollo,

This firm is counsel to Plaintiffs in the above-referenced action. Together with defense counsel, we submit this joint status report pursuant to this Court's December 19, 2025 Order. Additionally, Plaintiffs respectfully request an extension of the January 15, 2026 deadline to seek leave to move for class certification.

The Parties have been proceeding with pre-class certification discovery. On August 18, 2025, Plaintiffs served their Amended First Set of Discovery Demands on Defendants. On December 30, 2025, Defendants served their Second Set of Demands on the Named Plaintiffs and fifteen Opt-In Plaintiffs in accordance with the December 19, 2025 So-Ordered Stipulation. [See Dkt No. 41.] Defendants intend to serve their responses to Plaintiffs' Demands on or before the January 30, 2026 deadline in the So-Ordered Stipulation. [*Id.*] The Parties are working on their respective responses and anticipate completing discovery on or before the April 8, 2026 deadline.

Given that the Parties are engaged in pre-class certification discovery, and that the Court granted the Parties' request to extend the deadline for its completion to April 8, 2026 (see December 19, 2025 Order), Plaintiffs respectfully request that the January 15, 2026 deadline to seek leave to move for class certification be extended to on or before April 15, 2026.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Paige Piazza, Esq.

Cc: All counsel of record (via ECF)